

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GIDEON RAPAPORT,

Plaintiff,

v.

RICHARD ALLEN EPSTEIN, et al.,

Defendants.

Case No.: 24-cv-7439-JGLC

DEFENDANT MITCHELL K. PALLAKI'S MOTION TO DISMISS

Pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6), and upon the accompanying Memorandum of Law, Defendant Mitchell K. Pallaki hereby moves for an order dismissing the Amended Complaint with prejudice and granting other further relief as the Court may deem just and proper.

Dated: New York, New York
July 15, 2025

Respectfully submitted,

By: /s/ Seth L. Levine
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